

K. Chad Burgess
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Dominion Energy Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



April 27, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

Re: Request of Clifton Power Company on the Public Service Commission's
Jurisdiction of Electric Vehicle Charging Stations
Docket No. 2021-210-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC")
is a Petition to Intervene in the above-referenced docket.

By copy of this letter DESC is providing a copy of the Petition to Intervene to
the parties of record and enclose a certificate of service to that effect.

If you have any questions, please advise.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'K. Chad Burgess', with a stylized flourish extending to the right.

K. Chad Burgess

KCB/kms
Enclosures

cc:	Alexander W. Knowles, Esquire	Carri Grube-Lybarker, Esquire
	Charles B. Mierk	Courtney E. Walsh, Esquire
	Roger P. Hall, Esquire	Weston Adams III, Esquire
	John H. Tiencken, Jr., Esquire	Charles L.A. Terreni, Esquire
	Christopher S. McDonald, Esquire	Christopher R. Koon, Esquire
	(all via electronic mail and U.S. First Class Mail w/enclosures)	

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-210-E

IN RE:

Request of Clifton Power Company)	
on the Public Service Commission's)	PETITION TO INTERVENE
Jurisdiction of Electric Vehicle)	OF
Charging Stations)	DOMINION ENERGY
)	SOUTH CAROLINA, INC.
_____)	

Dominion Energy South Carolina, Inc. ("DESC" or "Company") hereby files with the Public Service Commission of South Carolina ("Commission") this Petition, pursuant to S.C. Code Ann. Reg. 103-825 (2012), and other applicable provisions of the Commission's Rules of Practice and Procedure, for permission to intervene in the above-captioned proceeding.

In support of this Petition, DESC respectfully would show unto the Commission the following key facts and would request and petition the Commission for the following relief:

1. DESC is a corporation duly organized and existing under the laws of the State of South Carolina, with its principal offices in Cayce, South Carolina. DESC's mailing address is 220 Operation Way, Cayce, South Carolina 29033. The Company is engaged in, among other things, the business of generating, transmitting, delivering and providing electricity to public and private energy users for compensation.

2. DESC operates an integrated electric utility system that serves approximately 772,000 customers in 24 counties in central, southern and southwestern South Carolina. DESC's service territory covers nearly 16,000 square miles in South Carolina including the metropolitan areas of Charleston, Columbia, Beaufort, and Aiken and many other smaller cities and towns, and rural areas in South Carolina.

3. Corporate legal counsel for DESC in this proceeding are as follows:

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matthew.gissendanner@dominionenergy.com

All correspondence and any other matters relative to this proceeding should be addressed to DESC's authorized representatives as stated hereinabove.

4. Per a request filed with the Commission on June 8, 2021, Clifton Power Company ("Clifton") stated it manufactures and installs electric vehicle charging stations ("EVCS") which will be located at various locations throughout South Carolina and included within DESC's electric service territory. Clifton requests the Commission advise as to its position regarding jurisdictional issues relating to the EVCS.

5. DESC has a substantial and material interest in the subject matter of the above-captioned proceeding, in that the outcome of the proceeding will directly

impact DESC. As a public utility, DESC is subject to the regulatory authority of the Commission pursuant to Title 58 of the Code of Laws of South Carolina. DESC's interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, DESC submits that good cause exists for the Commission to allow the Company to participate as a party in the above-captioned proceeding.

6. DESC has not developed a final position in this matter, but reserves the right to modify, amend or expand any position the Company develops during the course of this proceeding, including any position espoused herein.

WHEREFORE, having set forth its Petition, DESC respectfully requests that the Commission issue an order (i) granting the Company's petition to intervene in this matter and participate fully in the Docket and the hearing scheduled in this matter, (ii) granting DESC all rights attendant to intervenor status, including the right to be provided copies of all filings, pleadings, testimony, and exhibits, and (iii) granting such other and further relief as is just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,



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Attorneys for Dominion Energy
South Carolina, Inc.

Cayce, South Carolina
April 27, 2022

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2021-210-E

IN RE:

Request of Clifton Power Company on)	
the Public Service Commission's)	
Jurisdiction of Electric Vehicle)	CERTIFICATE
Charging Stations)	OF SERVICE
_____)	

This is the certify that I have caused to be served this day one (1) copy of Dominion Energy South Carolina, Inc.'s **Petition to Intervene** via electronic mail and U.S. Mail to the persons named below at the addresses listed:

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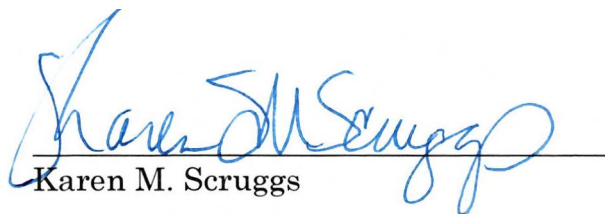
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Karen M. Scruggs

Cayce, South Carolina

This 27th day of April, 2022